

**EXHIBIT 15-1**

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**From:** Scott R. Bickford <srb@mbfirm.com>  
**Sent:** Tuesday, February 2, 2021 5:33 PM  
**To:** McClammy, James I.  
**Cc:** Harold D. Israel; cbrustowicz@clfnola.com; Kevin Thompson; Knudson, Jacquelyn Swanner; Kent Harrison Robbins - KHR Law Offices; Ernesto Reyes - KHR Law Offices; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Hoff, Robert; Townes, Esther C.; Donald Creadore  
**Subject:** RE: CONFIDENTIAL 19-CV-23649 - RDD NAS AD HOC REQUEST TO MEET AND CONFER SUBJECT: PPDP

I think in a majority of the cases the birth mothers are named but you are correct

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**From:** McClammy, James I. <james.mcclammy@davispolk.com>  
**Sent:** Tuesday, February 2, 2021 4:22 PM  
**To:** Scott R. Bickford <srb@mbfirm.com>  
**Cc:** Harold D. Israel <hisrael@lplegal.com>; cbrustowicz@clfnola.com; Kevin Thompson <kwthompsonwv@thompsonbarneylaw.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; Kent Harrison Robbins - KHR Law Offices <KHR@khrlawoffices.com>; Ernesto Reyes - KHR Law Offices <ereyes@khrlawoffices.com>; Hayden.Coleman@dechert.com; Danielle.GentinStock@dechert.com; Hoff, Robert <RHoff@wiggin.com>; Townes, Esther C. <esther.townes@davispolk.com>; Donald Creadore <donaald@creadorelawfirm.com>  
**Subject:** Re: CONFIDENTIAL 19-CV-23649 - RDD NAS AD HOC REQUEST TO MEET AND CONFER SUBJECT: PPDP

Thanks Scott and Don, we are reviewing the below and will revert. Just one initial question. With respect to the spread sheet of your clients, are those the names you would like us to run or are those the names of the children/babies/their

current guardians. I had thought that in many instances the claimants are not necessarily the birth mothers and the names you would like to have run are the names of the birth mothers. But perhaps I am have that wrong. Let me know.

J.I.M.

On Feb 2, 2021, at 4:13 PM, Scott R. Bickford <[srb@mbfirm.com](mailto:srb@mbfirm.com)> wrote:

Jim thanks for responding. We will be happy to send you a spread sheet of all of our clients but you already have that information from Primeclerk. Anne Andrews has made the cards one of the proof requisites of the PI/NAS TDP which we will oppose and as such the information now is immediately needed. Tell us what information you need beyond what you already have. Thank you

Scott Bickford

Please call me directly if you want to discuss. Too many emails

Sent from my iPhone

On Feb 2, 2021, at 3:04 PM, [donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com) wrote:

Hello Jim-

Thank you for your report and the information you provided regarding Purdue's Discount Card Program. We also want to let you know that we are evaluating how to work with Debtors' request that--instead of Debtors pursuing the matter further on its end--the NAS Children Ad Hoc first supply Debtors with certain data regarding individuals; and, how to comply (with the Debtors suggestion) without anyone involved running afoul of HIPPA regulations or related privacy limitations and concerns. This remains a work-in-progress on our end. You also mentioned that Debtors can search for patient information, so please now explain "the other ways, besides the discount card program," by which it can be determined if Purdue has information about those individuals. This information would, obviously, prove helpful to and inform our evaluation.

We are happy to discuss.

Many thanks,

Don

o/b/o NAS Children Ad Hoc

-----Original Message-----

From: "McClammy, James I." <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>

Sent: Friday, January 29, 2021 11:17am

To: "donald@creadorelawfirm.com" <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>,

"Knudson, Jacquelyn Swanner" <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>

Cc: "Scott R. Bickford" <[srb@mbfirm.com](mailto:srb@mbfirm.com)>, "Kent Harrison Robbins - KHR

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"Townes, Esther C." <[esther.townes@davispolk.com](mailto:esther.townes@davispolk.com)>

Subject: RE: CONFIDENTIAL 19-CV-23649 - RDD NAS AD HOC REQUEST  
TO MEET AND CONFER SUBJECT: PPDP

Don –

In your January 7, 2021 and January 14, 2021 emails, you requested data from Purdue's Savings Card Redemption or "discount card" program in order to determine if there is information in Purdue's possession that relates to whether the birth mothers of your clients had a Purdue prescription in the past. Specifically, you stated that the NAS Committee "believe[s] that Purdue has kept and continues to maintain in the regular course a variety of records concerning patients receiving discounts traceable to or connected with the ongoing" discount card program.

We have made a number of inquiries with the company and counsel who have conducted a number of searches in various ways and have determined that the discount card program data in Purdue's possession does not have the patient-identifying data (including patient name) necessary to determine whether the birth mothers of your clients had a Purdue prescription. Rather, the Savings Card Redemption data includes certain information regarding the patient's age and gender and information about the prescription itself, such as the date filled and prescriber and pharmacy information, but patient names are not included.

In your January 14, 2021 email and during prior meet and confers you also represented that the NAS Committee would provide the Debtors with a full list of your NAS clients who you believe participated in the discount program in a HIPAA compliant manner. To date, we have not received this information.

As we stated on prior calls, including our meet and confer on January 27, 2021, if you will provide us the names of the possible patients for which you are seeking this information, there could be other ways, besides the discount card program, to determine if Purdue has information about those individuals that would be responsive to your request. Subject to HIPAA and other privacy limitations/concerns, including whether you represent and/or are otherwise authorized to access the data for those patients, we are willing to conduct reasonable searches and provide you with responsive information we find. Again, Purdue does not maintain a comprehensive database of patient-identifying data, and, therefore, we cannot be sure whether a particular patient's name will be in documents and databases Purdue maintains. However, we can search for patient information if we know the names to search.

We remain open to discussing how best to retrieve and provide (subject to HIPAA) the information that you are seeking based on the information in Purdue's possession.

Best,

J.I.M.

**From:** [donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com) <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>

**Sent:** Thursday, January 14, 2021 5:42 PM

**To:** Knudson, Jacquelyn Swanner <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>; McClammy, James I. <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>

Cc: don creadore <Donald@creadorelawfirm.com>; Scott R. Bickford  
<srb@mbfirm.com>; Kent Harrison Robbins - KHR Law Offices  
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<ereyes@khrlawoffices.com>

**Subject:** CONFIDENTIAL 19-CV-23649 - RDD NAS AD HOC REQUEST TO MEET AND  
CONFER SUBJECT: PPDP

Hello Jacquelyn, Jim,

We wanted to give you more details of Purdue's Prescription Discounts Program ("PPDP") to assist you with familiarizing yourselves with our thoughts about the PPDP, if only to supplement what you may have already ascertained from your clients since we raised the PPDP during last Friday's meet and confer regarding search results[1] and the PPDP. This active Purdue program provides savings to eligible patients on certain Purdue drugs, including opioids, <https://www.purduepharma.com/healthcare-professionals/products/>

You can appreciate that the NAS Children Ad Hoc is seeking information related to PPDP for purposes of, for example, convenient and reliable linking of various NAS claimants to Purdue's opioid products to satisfy requirements of the proof of claim form. We believe that Purdue has kept and continues to maintain in the regular course a variety of records concerning patients receiving discounts traceable to or connected with the ongoing PPDP.

If this data is something you believe is available, as we do, and Debtors agree to share the data with the NASAHC, the NASAHC can furnish Debtors with a full list of NAS clients in a HIPPA compliant manner whom, we believe, are PPDP participants.

At this juncture, we are proposing another 'meet and confer' to get Debtors' thoughts regarding the PPDP and our outstanding requests; would your team be available tomorrow, Friday, at 4:30p est.?

Thank you for your continued cooperation in this matter.

**Donald Creadore**

o/b/o Purdue NAS Ad Hoc Committee  
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New York, New York 10123  
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[1] As of this writing the UCC has not released any of the Debtors' documents, but we appreciate that only this afternoon (approx. 5p est.) the Debtors' communicated with the UCC approving its release of the Debtors' documents to NASAHC.

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